REMARKS/ARGUMENTS

Claims 1-20, 35-53, and 56-68 are pending in this application. Claims 1-20, 35-53 and

56-68 stand rejected.

CLAIMS 1-20, 35-47, 50-51, 56-57, AND 60-68 DEFINE OVER HALL IN VIEW OF HULSE

Claims 1-20, 35-47, 50, 51, 56, 57, and 60-68 are rejected under 35 U.S.C. § 103(a) as

being unpatentable over Hall et al., hereinafter ("Hall"), (US Pub. No. 2003/0208493), in view of

Hulse et al., hereinafter ("Hulse"), US Pub. No. 2004/0122861). Applicant respectfully

traverses.

Hall purportedly teaches an object relational database management system permitting a

client application to access one or more data sources. *See* Hall, Abstract. Hulse purportedly

teaches a method of providing an application development environment that produces an

application framework in a development language-neutral manner which is later adapted into a

particular programming language based upon the identity of a requesting device and the

requesting user. *See* Hulse, Abstract.

Applicant agrees with the Office Action's statement that Hall does not specifically teach

setting at least one property of the instantiated company object on the client system with data

from the client system, as recited in representative independent claim 1. *See* Office Action, April

6, 2007, p. 3. The Office Action, however, alleges that Hulse supplies the deficiency of Hall.

Applicant respectfully disagrees.

To establish a case of prima facie obviousness, the prior art references must teach or suggest all the claim limitations, a suggestion or motivation to modify or combine the references must exist, and there must be a reasonable expectation of success. MPEP § 2143.

Hulse does not teach or suggest *setting at least one property of the instantiated company object on the client system with data from the client system*, as recited in representative independent claim 1. The object disclosed in paragraph [0040] of Hulse is not an instantiated company object as recited in claim 1. Claim 1 provides that a company object is an instance of a company class conforming to a component object model standard to access data in a server-based business database system. In contrast, Hulse does not teach or suggest that the object, an automobile fender part, of paragraph [0040] conforms to a COM standard and accesses data in a server-based business database system. Rather, Hulse teaches that actions may be taken by the user with respect to the object after the application appropriate rendering is provided to the client device. Hulse, however, is silent with respect to the result of an action selection on the object. This is not surprising given that the entire system of Hulse is directed to providing an application framework in a development language-neutral manner and providing application appropriate renderings to client devices based on the type of device and the type of requesting user. Hulse simply is not directed to and does not teach or suggest the use of objects to access databases. As such, because Hulse fails to teach or suggest setting at least one property of the instantiated company object on the client system with data from the client system, Applicant respectfully requests reconsideration and withdrawal of the rejection of claims 1, 11, 35, and 42 under 35 U.S.C. § 103(a). As dependent claims 2-10, 12-20, 36-41, 43-53, and 56-68 depend from

independent claims 1, 11, 35, and 42, reconsideration and withdrawal of the rejections of these claims also are respectfully requested.

In addition or in the alternative, Hall and Hulse each fail to provide any suggestion or motivation for combining or modifying Hall in view of Hulse. Hall purportedly discloses an object relational database management system permitting a client application to access one or more data systems. As noted previously in the Amendment of December 19, 2006, Hall defines and populates data objects with data obtained from server-side data sources. *See* Hall, paragraph [0068]. An advantage of this system according to Hall is that an ObjSvr component used to retrieve data from data sources does not need to have any knowledge of or access to data storage structures until the storage structure and access specification are provided at run-time, thus preventing the need to modify program code to explicitly match the data storage structure to be accessed. *See* Hall, paragraphs [0063]-[0064]. As such, Hall teaches away from setting a property of the instantiated company object on the client system with data from the client system.

Hulse also fails to provide a teaching or suggestion to this effect. As previously stated, Hulse purportedly concerns providing application appropriate renderings to client devices based on a development language-neutral application framework. One of skill in the art would not find it obvious to modify Hall in view of Hulse because the object of Hulse does not conform to a COM standard and access a server-based business database system. Even assuming for argument's sake that the object of Hulse does conform to a COM standard and access a database system, one of ordinary skill in the art still would not find it obvious to combine the limitations of Hulse with the system of Hall, as the limitations of Hulse do not improve the system of Hall. Each action taken by a user with respect to the object of Hulse only increases the number of IPC

calls and network round trips between the client application and the server-based database system. These increased calls and network round trips burden the system of Hall and run counter to one of the stated advantages of instantiating a company object on a client system and setting at least one property of the instantiated company object on the client system with data from the client system, namely, improved efficiency in accessing a server-based database system from a client application through the reduction in the number of calls and network round trips needed between the client application and the server. As the limitations of Hulse would run counter to one of the stated advantages of the presently claimed system, one of ordinary skill in the art would not be motivated to combine the two references. Accordingly, for at least this reason as well, Applicant respectfully submits that the rejection to claims 1, 11, 35, and 42 is improper, and respectfully requests reconsideration and withdrawal of the rejection under 35 U.S.C. § 103(a) of claims 1, 11, 35, and 42. As dependent claims 2-10, 12-20, 36-41, 43-53, and 56-68 depend from independent claims 1, 11, 35, and 42, reconsideration and withdrawal of the rejections of these claims also are respectfully requested.

Dependent Claims

Regarding the company object in dependent claims 61, 63, 65, and 67, the Office Action cites Hall's ObjSvr component 22 as teaching the recited company object. As cited in the rejection of the independent claims, Hall states only:

> "The client applications 16 are any code entity that either instantiates an ObjSvr component 22 or makes use of an existing instance of an ObjSvr component 22."

Hall explains elsewhere however (*e.g.*, paragraph [0044], [0068]) that objects are provided to the ObjSvr component 22 in accordance with metadata read from the ObjDef

database 24 on the server by the ObjDef component 20. The objects also are populated by data from the metadata retrieved from server-side data sources. Thus, the ObjSvr component 22 does not suggest the limitations in claims 61, 63, 65, and 67 that "all business objects used by the external program/client system/computer system to access the business database exist as *predefined* component object model *objects on the client/computer system.*" For at least this reason as well, reconsideration and withdrawal of the rejection of dependent claims 61, 63, 65, and 67 are respectfully requested.

Claim Rejections – 35 USC § 103(a)

Claims 48, 49, 52, 53, 58 and 59 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Hall, (US Pub. No. 2003/0208493), in view of Hulse, (US Pub. No. 2004/0122861), and further in view of Srinivasan et al., hereinafter ("Srinivasan"), (US Pub. No. 2004/0128400).

The combination of Hall in view of Hulse, and further in view of Srinivasen does not suggest overcoming the deficiencies of Hall in view of Hulse discussed above with regard to the independent claims. Accordingly, Applicant submits that claims 48, 49, 52, 53, 59 and 59 are patentable, at least as further limitations on independent claims 1, 11, 35, and 42.

Based on these remarks, reconsideration and withdrawal of the rejections are respectfully requested.

Request for Allowance

It is believed that this Amendment places the application in condition for allowance, and early favorable consideration of this Amendment is earnestly solicited.

Applicant authorizes the Commissioner to charge any fees determined to be due with the exception of the issue fee and to credit any overpayment to Deposit Account No. 11-0600.

The Examiner is invited to contact the undersigned at (202) 220-4209 to discuss any matter concerning this application.

Respectfully submitted,

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Dated: June 6, 2007   By: __/Mark D. Yuan/_____
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